

Via U.S. Mail

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OTHER: 40009

January 22, 2007

Joseph F. LeMay, P.E. Remedial Project Manager US EPA - Region I 1 Congress Street, Suite 1100 (HBO) Boston, MA 02114-2023

Re:

Changes to carbon tanks and piping

UniFirst Corporation

Wells G&H Site, Woburn, MA

Dear Mr. LeMay:

During the last year of operations at the UniFirst treatment system temporary carbon tanks have been used in place of the two carbon tanks installed in 2003. The epoxy coating of the 2003 tanks failed and the tanks began to leak slowly. The original carbon tanks, manufactured by TIGG, have a rubber lining that has withstood the test of time very well; however, the exterior of these tanks and the fittings are showing their age.

UniFirst has developed a plan to replace all four steel carbon tanks with four fiberglass, polyethylene-lined tanks. These tanks, which have the same carbon capacity as the existing tanks, will be placed in line along the south wall of the treatment plant. Each tank will have an influent line and air vent in the top cover, which also serves as the manway for servicing the carbon. At the bottom of each tank there will be an effluent line and a drain valve. The fixed piping and valve system constructed when the system was changed to carbon-only treatment in 2003 will be removed and replaced with a system using flexible hoses. Any new piping installed to make the connections will be 2" diameter Schedule 80 PVC or 2" diameter flexible hose.

The revised tank and piping layout is shown in the enclosed piping layout drawing. The revisions to this drawing reflect the changes associated with the new carbon vessels and the new piping. There are no plans for changes in the operational procedures for any of the other equipment, in the types of information being monitored by the data logger, or in any other operational aspect of the treatment system. Upon completion of the installation, UniFirst will update the Operations and Maintenance Plan to reflect the as-built conditions and provide a copy to EPA.

We anticipate that a plant shutdown of up to one week will be needed to drain, empty and remove the existing tanks, install the new tanks and carbon, reconfigure the piping and test the installation. UniFirst has ordered the fiberglass tanks and expects delivery in mid-February. The installation is likely to be done in late February or early March. I would appreciate your approval of this proposed change to the tanks and piping by February 9.

Should you have any questions, please call.

Sincergly,

Timothy M. Cosgrave Project Manager

TMC:hs enclosure

cc: Jennifer McWeeney, BWSC, DEP

David Sullivan, TRC

